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November 1, 2000

Mr. Richard Sprott, Acting Director
Division of Air Quality
Utah Department of Environmental Quality
P.O. Box 144820
Salt Lake City, UT 84114-4820

Attention: Nando Meli, Jr., New Source Review Section
RE: Approval Orders: DAQE-911-99, DAQE-278-00

Dear Mr. Sprott:

Experimental Approval Order to Test Burn Petroleum Coke: REPORT

The Intermountain Generating Station (IGS) has performed two test burns of petroleum coke as a supplemental fuel under the authority of two approval orders (AOs) issued by the Division of Air Quality (DAQ). The Los Angeles Department of Water and Power (DWP) is hereby submitting the results of those burns as required in the above referenced AOs.

TEST BACKGROUND

On October 26, 1999, DWP, as the Operating Agent for IGS, submitted a Notice of Intent to perform trial test burns of pet coke as a supplemental fuel. The IGS is a coal-fired, steam electric plant located in Millard County. The trial burns were intended to ascertain the combustion characteristics and environmental aspects of using a fuel mix of 80/20 coal/pet coke. The results of the test burns will help DWP and the Intermountain Power Service Corporation (IPSC) determine the viability of using pet coke on a permanent basis. DWP and IPSC will submit a new Notice of Intent to request approval if we determine that an additional test burn(s) is required or if we ultimately determine that pet coke may be used as a supplemental fuel continuously.

The DAQ issued an experimental AO, DAQE-911-99, on November 9, 1999, granting the trial burns, and issued an amended AO, DAQE-278-00, on May 2, 2000, to allow further testing. The AOs outlined the conditions under which the test burns could occur. This letter serves as the report required by the AOs.

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TEST SUMMARY AND APPROVAL ORDER COMPLIANCE

Pet coke was combusted in two trial burns. The first burn occurred from December 3 to December 13, 1999, using a blend of 8,795 tons of pet coke combusted with 75,616 tons of coal. The second burn occurred from May 30 to June 17, 2000, using 24,114 tons of pet coke combusted with 120,180 tons of coal.

The AO was issued contingent upon compliance with seven conditions to be followed during the test burn. See page 2 of DAQE-278-00. Those conditions are outlined below. Please note that Ms. Debbie Olsen of your office reviewed and verified compliance with the conditions listed in the AO.

1. IPSC burned pet coke only in the Unit 1 main boiler at IGS, as required.

2. Pet coke testing was to be limited to 120 days after the date the AO was issued. The last of the pet coke was burned on June 17, 2000, well within the 120-day period. Also, the testing was to be limited to 40,000 tons of pet coke. IGS combusted 8,795 tons of pet coke in the first trial burn, and 24,114 tons in the second test, for a total of 32,909 tons.

3. The average burn ration of pet coke was not to exceed a 20% blend with coal. The average pet coke blend during the tests was approximately 16.8%.

4. Permit requirements were met during the test burns. Emissions did not exceed limits as verified by continuous monitoring, visual observations, and calculated results (see emissions summary below and enclosed worksheets).

5. Testing was to be terminated if Permit limits were exceeded. Plant opacity and SO2 removal rates were within permit requirements. An excess emission report for particulates (opacity) was filed during the first test burn due to an unit trip and associated start-up, but this was an allowed exception to permit limits.

6. Continuous Emissions Monitoring (CEM) summary data and calculated results, including particulate emissions are described below, with attachments included.

The seventh requirement was to provide this report, including emissions results covering CEMS data, hazardous air pollutants (HAPs), and associated pet coke analyses. We have included with this letter an Excel spreadsheet diskette in electronic format containing these required data. The file includes ten worksheets of various information. Those worksheets are described here:

1. Unit One Daily Summary. This worksheet contains the CEM data for each test burn.
2. Unit One 30-Day Rolling Average. This worksheet provides the 30 DRA calculations to compare against permit requirements and standards.
3. HAPs Summary. This worksheet summarizes and totals emissions of NSPS and HAPs compounds that are calculated individually for pet coke and coal on the next four worksheets.
4. Petcoke Test 1 HAPs. This worksheet uses fuel analysis of specific chemicals, as well as emission factors to determine emissions of HAPs during the first trial burn.
5. Petcoke Test 2 HAPs. This worksheet uses fuel analysis of specific chemicals, as well as emission factors to determine emissions of HAPs during the second trial burn.
6. Coal1 HAPs. This worksheet uses fuel analysis of specific chemicals, as well as emission factors to determine emissions of HAPs during the first trial burn.
7. Coal2 HAPs. This worksheet uses fuel analysis of specific chemicals, as well as emission factors to determine emissions of HAPs during the second trial burn.
8. PM10. This worksheet calculates particulate emissions from each trial burn.
9. Fuel Usage. This worksheet outlines daily quantities of fuel burned during testing.
10. Fuel Data. This worksheet provides analyses for each daily blend as well as each shipment of pet coke. This sheet also includes analytical data for trace constituents used to calculate HAPs.

If you require any further information concerning the testing of pet coke or issues tied to this AO, please contact Mr. Dennis Killian, Superintendent of Technical Services at IPSC, at (435) 864-4414, or dennis-k@ipsc.com .

Sincerely,

MICHAEL J. NOSANOV
IPP Operating Agent/
Coal Business Manager

Enclosures

c: Mr. Dennis Killian, IPSC
/Mr. Rand Craft, IPSC